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*Attorneys for Valley Electric Association, Inc.*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

ANGELA EVANS. an individual,  
Plaintiff,

vs.

VALLEY ELECTRIC ASSOCIATION, INC.;  
DOES I through X; and ROE Corporations XI  
through XX, inclusive,  
Defendants.

Case No. 2:20-cv-00986-RFB-VCF

ANGELA EVANS,  
Plaintiff,

vs.

NYE COUNTY SHERIFF'S OFFICE, a political  
subdivision of the State of Nevada; DAVID  
BORUCHOWITZ, individually,  
Defendants.

Case No. 2:20-cv-01919-RFB-VCF

**STIPULATION AND [PROPOSED]  
ORDER TO CONTINUE  
REBUTTAL EXPERT DEADLINE  
(First Request)**

ANGELA EVANS ("Evans"), VALLEY ELECTRIC ASSOCIATION, INC. ("Valley Electric"); NYE COUNTY SHERIFF'S OFFICE ("NCSO"), and DAVID BORUCHOWITZ (collectively, the "Parties," and each a "Party"), by and through their respective counsel, stipulate as follows:

WHEREAS, the deadline to disclose rebuttal experts is currently set for June 11, 2021 [ECF No. 49];

1 WHEREAS, Plaintiff has represented that her damages expert is not available for  
2 deposition until after the rebuttal expert deadline has passed, which impacts Defendants' ability to  
3 timely complete their rebuttal expert report;

4 WHEREAS, Defendant Valley Electric Association, Inc. issued a subpoena and deposition  
5 notice scheduling the deposition of Plaintiff's Human Resources expert, Ms. Coneisha Sherrod, for  
6 June 8, 2021;

7 WHEREAS, the Sherrod deposition did not go forward as previously scheduled, which  
8 impacts Valley Electric Association, Inc.'s ability to timely complete its rebuttal expert report;

9 NOW THEREFORE, in light of the foregoing, all parties stipulate and agree that the  
10 deadline for disclosing rebuttal experts, currently set for June 11, 2021, is continued by thirty-one  
11 (31) days to **July 12, 2021** (the thirtieth day, July 11, 2021, being a Sunday). Any depositions of  
12 rebuttal experts (or other witnesses that a party intends to offer to rebut the rebuttal expert) may  
13 occur within thirty (30) days after July 12, 2021.

14 Pursuant to LR IA 6-1, the parties state that while the rebuttal deadline has necessarily been  
15 extended as a result of two (2) prior requests to extend the discovery cut-off, this is the first request  
16 directed at continuing only the rebuttal expert disclosure. Good cause exists for this extension, as  
17 one of Plaintiff's experts has been unavailable for deposition, and the other did not appear for her  
18 deposition as noticed. Pursuant to LR 26-3, the parties note that at least five (5) additional  
19 depositions are already noticed and/or will otherwise move forward in this matter. The parties  
20 submit this stipulation not for purposes of delay, but because Defendants have not yet been able to  
21 depose individuals that Plaintiff has identified as experts.

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The parties seek only to continue the rebuttal expert deadline. No other deadlines are affected, and no trial date has been set.

**IT IS SO STIPULATED.**

Dated this 8<sup>th</sup> day of June, 2021.

MARQUIS AURBACH COFFING

By: /s/ James A. Beckstrom  
Craig R. Anderson, Esq.  
Nevada Bar No. 6882  
James A. Beckstrom, Esq.  
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Las Vegas, Nevada 89145  
*Attorneys for Defendants Nye County  
Sheriff's Office & David Boruchowitz*

Dated this 8<sup>th</sup> day of June, 2021.

LAGOMARSINO LAW

By: /s/ Andre M. Lagomarsino  
Andre M. Lagomarsino, Esq.  
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Henderson, NV 89052  
*Attorneys for Plaintiff*

Dated this 8<sup>th</sup> day of June, 2021.

GABROY LAW OFFICES

By: /s/ Christian Gabroy  
Christian Gabroy, Esq.  
Nevada Bar No. 8805  
Kaine Messer, Esq.  
Nevada Bar No. 14240  
The District at Green Valley Ranch  
170 South Green Valley Pkwy., Ste 280  
Henderson, NV 89012  
*Attorneys for Plaintiff*

Dated this 8<sup>th</sup> day of June, 2021.


FENNEMORE CRAIG, P.C.

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THE SANFORD FIRM

By: /s/ Brian P. Sanford  
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(*Pro Hac Vice*)  
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*Attorneys for Plaintiff*

IT IS SO ORDERED.



Cam Ferenbach  
United States Magistrate Judge

6-9-2021

Dated: \_\_\_\_\_